

CERTIFICATION OF CPNI FILING - February 3, 2006

WC Docket No. 05-196 Reference: EB-06-TC-060

I, Dave Lewis, President of Associated Network Partners, Inc. ("ANPI") do hereby certify that ANPI is fully compliant with the FCC's CPNI rules 47 CFR Section 64.2009 and EB-06-TC-060. I have personal knowledge that the procedures we have adopted are adequate to ensure compliance with the FCC rules. ANPI is not a telecommunications carrier because it does not have end-user customers and does not market service to end-user customers. ANPI handles CPNI of telecommunications carriers only to support the services that ANPI provides to those carriers.

Name: Dave Lewis

Title: President

STATEMENT

____ Date: <u>2/9/04</u>

The operating procedures of the Company are designed to ensure compliance with the CPNI rules applicable to the Company. Such procedures include the following.

CPNI Use

- (1) ANPI uses, discloses or permits access to CPNI only to support the services it provides to its customers, which are interexchange service providers. In the course of providing service, it uses, discloses or permits access to CPNI only to protect its rights and property, its customers or their end-user Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, ANPI's services.
- (2) ANPI does not use, disclose or permit access to CPNI to provide or market service offerings. ANPI does not control or have authority to control other uses of CPNI made by the primary owners of that CPNI, ANPI's interexchange provider customers.

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- (3) ANPI uses, discloses or permits access to CPNI derived from its support of the interexchange services provided by retail interexchange service providers.
- (4) ANPI does not use, disclose or permit access to CPNI to provide or market service offerings.
- (5) ANPI does not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers.

CPNI Approvals

(1) Because ANPI makes no marketing use of CPNI belonging to its customers, which are retail interexchange service providers, ANPI has no occasion to obtain end-uder customer approval through written, oral or electronic methods.

CPNI Notice Requirements

(1) Because ANPI makes no marketing use of CPNI belonging to its customers, which are retail interexchange service providers, ANPI has no occasion to notify and inform any end-user Customer of his or her right to restrict the use or disclosure of, and access to, CPNI.

CPNI Safeguards

- (1) ANPI makes no use of CPNI belonging to its customers, which are retail interexchange service providers.
- (2) ANPI has trained its personnel as to when they are, and are not, authorized to use CPNI, and ANPI has have disciplinary processes in place.
- (3) Because ANPI makes no marketing use of CPNI belonging to its customers, which are retail interexchange service providers, ANPI has no occasion to record sales and marketing campaigns that use end-user Customers' CPNI. Such recording would be done by ANPI's customers, who own the CPNI.
- (4) ANPI has established a supervisory review process regarding compliance with the CPNI rules insofar as they affect ANPI's handling of our customer's CPNI.
- (5) Since ANPI is not telecommunications carrier, ANPI has not provided an annual compliance filing.
- (6) Since ANPI does not deal with end-user customers, ANPI has never had an occasion to handle any opt-out mechanisms and, therefore has never had to provide written notice

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within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly.